

Lane LLC's sole member is Greg Merle. Based upon reasonable inquiry, Steve Brooks, Clark Kent LLC, Ramon Escandon, and Daniel Inchausti, Chipper Investment SCR, SA, and Javier Busto may have a financial interest in one or more of the foregoing entities.

Prior to January 31, 2020, the ownership structure of CEW included, Convergen Energy LLC (hereinafter "CE LLC"), which was owned by Convergen Energy, Inc, which was owned by First North American Holdings II. The precise ownership of First North American Holdings II is unknown to respondents. CE LLC was formerly Greenwood Fuels.

Since January 31, 2020 to the date of this response, the officers of CEW are Ted Hansen and Steve Brooks. Greg Merle is manager of CEW.

Immediately prior to January 31, 2020, the officers of CE LLC were Fidel Andueza (President), Bert Diaz (Secretary), and Steve Brooks (Vice President). Immediately prior to January 31, 2020, the officers of CE Wisconsin LLC were Fidel Andueza and Bert Diaz.

INTERROGATORY NO. 4A: Describe the current and historical financial relationship of each of the defendants in this action in CEW and in any entities in the chain of ownership of CEW.

RESPONSE TO INTERROGATORY NO. 4A: Objects to this Interrogatory on the grounds that this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence relating to Plaintiffs' application for preliminary injunction, and is therefore outside the bounds of permissible discovery pursuant to the Court's May 19, 2020 Order, that the Interrogatory does not identify a time frame, and the term "financial relationship" is vague.

Subject to the above objections and the General Objections, and without waiving any statements therein, Convergen Energy WI, LLC incorporates its answer to Interrogatory No. 4.

When CE LLC owned L'Anse Warden Electric Company the lenders involved at various times were Riposte, Yellowstone, Clark Kent LLC, and Javier Busto. Respondent's understanding is that Riposte was comprised of friends and family of George Logothetis, Yellowstone was an independent lender, Clark Kent LLC was affiliated to the family of Steve Brooks, and Javier Busto was a friend of Fidel Andueza.

With respect to the financial structure after the January 31, 2020 transaction it is respondent's understanding that Clark Kent LLC and Javier Busto continue to be lenders.

Convergen Energy WI, LLC has notes evidencing debt to BMO Harris, Wisconsin Economic Development Corporation, Toyota Corporation (forklift) and John Deere (loader). Convergen Energy WI LLC has no notes or payables to the parties identified in Interrogatory No. 4. The membership interest in 4406 Cypress Lane, LLC is held solely by Greg Merle.

Neither Ted Hansen nor Brian Mikkelson have a financial interest, other than their employment, in CEW. Neither Ted Hansen nor Brian Mikkelson have a financial interest in Nianticvista Energy LLC, 4406 Cypress Lane LLC, or in any of the parties with a financial interest identified in Interrogatory No. 4.

INTERROGATORY NO. 6: Describe the consideration Steven J. Brooks received directly or indirectly for providing a personal guaranty of Convergen Energy WI, LLC's Credit Agreement of \$2,375,000 to BMO Harris Bank N.A. dated January 31, 2020.

RESPONSE TO INTERROGATORY NO. 6: Objects to this Interrogatory on the grounds that this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence relating to Plaintiffs' application for preliminary injunction, and is therefore outside the bounds of permissible discovery pursuant to the Court's May 19, 2020 Order.